Donald D. duBoulay

Attorney at Law

Telephone: (212) 966-3970 Fax: (212) 941-7108

E-mail

dondubesq@aol.com

The Honorable Kimba M. Wood United States District Judge Southern District of New York 500 Pearl Street New York, New York 10007

Re: United States v. Victoria Palma- Brea 20 Cr. 199 (KMW)

Dear Judge Wood:

I represent Ms. Palma-Brea in the above referenced matter. I write with the consent of the Government and Pretrial officer to respectfully request a modification of Ms. Palma-Brea's bail condition to expand her travel to the District of Pennsylvania and the District of New Jersey.

Ms. Palma-Brea makes this request in order to visit her brother and his family in Wilkes Barre, Pennsylvania along with her minor children. The drive to her brother's residence in Wilkes-Barre, PA, necessitates her travel through the District of New Jersey.

If permitted to travel Ms. Palma Brea would reside with her brother's family at 72 Mundy St. Wilkes-Barre Pa 18702. The pretrial officer has the telephone number of her brother's residence.

As stated above, I have consulted with the government and pre-trial officer and neither object to this application.

Respectfully submitted, /s/

Donald duBoulay

cc: Kedar Bhatia, Esq, AUSA Branden Harper, Esq, AUSA Marlon Ovalles, PTO 305 Broadway, Suite 602 New York, NY 10007

June 19, 2020
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SO ORDERED